

**APPENDIX B, TABLE B.2.15**

**DISPOSITION OF WRITTEN  
GENERIC NEI COMMENTS**

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Table B.2.15: Disposition of Written Generic NEI Comments

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-1	B.3.2	Based on the lessons learned from the review of the first few renewal applications, the GALL provides sufficient credit for existing programs. As renewal applications continue to be submitted and reviewed, the NRC should consider future revisions to GALL to capture any additional lessons learned.	The GALL report is somewhat limited in that the existing programs must be generic. Obviously, renewal applicants will credit existing programs that are plant specific but at this time it seems that the focusing GALL on the generic programs is appropriate.	See NRC disposition of comment ACRS-2 in Table C of this NUREG.
NEI-2	B.3.2	The GALL report does not provide too much credit for existing programs. The programs credited in GALL are a reflection of the programs credited in the first few renewal applications. The technical detail is sufficient. The GALL evaluates the existing programs against ten attributes that are typically found in adequate aging management programs.		<p>The comment is NEI's opinion on the GALL report's credit of existing programs.</p> <p>The GALL report was not revised to address this comment.</p>

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-3	B.3.2	While we do not agree that all ten elements need to exist for a program to be found adequate, the fact that GALL uses all them is a testament to the robustness of the technical evaluation.		<p>The GALL report is not a regulatory requirement, but a guidance document; therefore, each AMP proposed will be evaluated to determine whether it meets the requirements specified in the license renewal rule. The 10-element evaluation approach has worked well in the GALL report and the staff review of the initial license renewal applications.</p> <p>See NRC disposition of comment NMC-3 in Table C of this NUREG for a discussion on how NRC staff will use the SRP-LR (NUREG 1800) to evaluate proposed AMPs.</p> <p>The GALL report was not revised to address this comment.</p>
NEI-4	B.3.2	If a specific revision of a code - say those published by the American Concrete Institute (ACI), is referenced and evaluated in GALL a renewal applicant can indicate that they use the same program at their facility and rely on the GALL evaluation. If the ACI standard used by an applicant is different from that in the GALL then the applicant must demonstrate that its program is adequate in the areas which differ between the standard revision contained in GALL and the revision of the standard which the applicant uses.		<p>See NRC disposition of comment ACRS-2 in Table C of this NUREG.</p>

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-5	B.3.2	<p>This question addresses the staffs desire for an applicant to discuss, in its application, any aging effects identified in the draft GALL report for a particular structure or component that the applicant has determined to be not applicable to its plant. It appears that the GALL identified aging effects are to be used by the staff as a checklist of those that require management. This implies that it would be acceptable for an applicant to use the GALL to determine which aging effects require management. Is this the staffs intent? Is it acceptable for an applicant to refer to the GALL for a particular system or structure with the same materials and environments as those identified in the GALL, and use it as a basis for conclusions regarding the aging effects requiring management? If the GALL is intended to provide guidance regarding the need to manage certain aging effects as well as guidance on the adequacy of existing plant programs, then this appears to be an acceptable approach.</p>		See NRC disposition of comment NMC-8 in Table C of this NUREG.

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-6	B.3.3	It is not clear what type of certification is acceptable nor is it clear what the NRC staff will look for if they examine the on-site verification documents.	Some insight into the certification question is found in the Standard Review Plan. We believe the language in Subsection 3.1.3.1 is the appropriate language if an applicant is relying in a program evaluated in the GALL report. We recommend the other sections and subsections in the SRP-LR be revised to be consistent with subsection 3.1.3.1.	See NRC disposition of comment NMC-2 in Table C of this NUREG.
NEI-7	B.3.3	When a program evaluation in GALL concludes that no further evaluation is necessary, there should be a statement that the program is adequate and demonstrably effective in managing aging in the period of extended operation.		See NRC disposition of comment NMC-2 in Table C of this NUREG.
NEI-8	B.3.3	We would appreciate the opportunity to discuss with NRC staff the possibility of a program evaluation for IWB-2500 with the NRC staff. We are willing to provide draft evaluations for the NRC staff review but believe it's important to reach agreement with the NRC staff on how that evaluation will be partitioned.		The GALL report, Chapter XI evaluates aging management program XI.M1 "ASME Section XI Inservice Inspection, Subsections IWB-2500, IWC-2500, and IWD-2500."  The GALL report was revised to address this comment by providing an evaluation of IWB-2500 in AMP XI.M1.
NEI-9	B.3.4 Reg. Guide	Does the Reg. Guide need to address the issue of electronic submittal.	None Provided	See NRC disposition of comment DG-1104-2 in Table C of this NUREG.

**Table B.2.15: Disposition of Written Generic NEI Comments (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis For Comment</b>	<b>NRC Disposition</b>
NEI-10	B.3.5 NEI 95-10	Make changes to NEI 95-10	None Provided	Appropriate changes were incorporated into NEI 95-10.  The GALL report was not revised to address this comment.
NEI-11	B.3.5 NEI 95-10	Incorporating guidance on the use of GALL	None Provided	See NRC disposition of comment NMC-2 in Table C of this NUREG.
NEI-12	B.3.5 NEI 95-10	Updating Appendix B consistent with the comments provided on GALL	None Provided	Appropriate changes were incorporated into NEI 95-10.  The GALL report was not revised to address this comment.
NEI-13	B.3.5 NEI 95-10	Refinements to the standard applicant format guidance in chapter 6	None Provided	Appropriate changes were incorporated into NEI 95-10.  The GALL report was not revised to address this comment.
1	B.3.9 NEI 95-10 Sect. 1.5	NEI 95-10, Section 1.5 discusses resolution of current safety issues. SRP-LR Appendix A.2 provides a similar discussion. The current descriptions are not consistent and the threshold for addressing new issues may be too low.	An approach needs to be developed to address any new issues that reveal themselves over the course of the review of license renewal applications.	See NRC disposition of SA3.1 in this Appendix B, Table B.2.14.  The SRP-LR was revised to address this comment by providing clear and specific guidance for reviewing and resolving current generic safety issues.
2	B.3.9 NEI 95-10 Sect. 5.1.3	NEI 95-10, Section 5.1.3 should be revised to delete the following statement: " For example, poisons in the high density spent fuel racks have coupons that are periodically removed and tested to verify that the rack continues to be capable of performing its intended function."	Aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA. Note that Section X of the SRP-LR contains several TLAA program descriptions	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
3	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-1 should be revised to delete Section 3.1 of the Application Table of Contents and renumber the remaining Chapter 3 sections to align with equivalent sections of the SRP-LR.	Alignment of the documents. NRC SRP-LR no longer has a section 3.1 describing common aging management programs	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
4	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-1 should be revised to delete Section 4.7 of the Application Table of Contents and renumber the remaining Chapter 4 section to align with equivalent sections of the SRP-LR.	Alignment of the documents – As noted above, aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA.	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
5	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-2 should be revised to delete Section 4.7 of the Application Table of Contents and renumber the remaining Chapter 4 section to align with equivalent sections of the SRP-LR.	Alignment of the documents – As noted above, aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA.	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
6	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-2 should be revised to delete Section 3.7 of the Application Table of Contents and renumber the remaining Chapter 3 section to align with equivalent sections of the SRP-LR.	Alignment of the documents. NRC SRP-LR no longer has a section 3.1 describing common aging management programs	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
7	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-2 should be revised to offer guidance to applicants for using the GALL report as part of the aging management review.	<i>TBD</i>	See NRC disposition of NEI comment 1 in this Appendix B, Table B.2.15.